

WWW.RIVKINRADLER.COM

926 RXR Plaza Uniondale, NY 11556-0926 T 516.357.3000 F 516.357.3333

KENNETH A. NOVIKOFF

PARTNER (516) 357-3110 <u>ken.novikoff@rivkin.com</u>

December 3, 2024

VIA ELECTRONIC MAIL

Judge Margaret M. Garnett Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

Re: Alonzo Harris v. Enterprise Car Rental. et. al.

SDNY Index No.: 24-CV-05634

Your Honor:

The law firm of Rivkin Radler LLP represents Defendant ELRAC, LLC, incorrectly named in the caption as Enterprise Car Rental. ELRAC's time to file its responsive pleading is December 6, 2024. *See, Dkt. #11*.

Pursuant to Your Honor's Order dated November 12, 2024, *see*, *Dkt #10*, Plaintiff *pro se* is required, by December 6, 2024, to provide this Court with certain information concerning, *inter alia*, Enterprise Holdings, Inc. ("EHI"). My Firm will also be representing EHI and will file a Notice of Appearance on its behalf at the appropriate time.

To avoid additional efforts on the part of both Plaintiff *pro se* and the United States Marshals Service to effectuate service on EHI, I advise the Court that I am authorized to accept service on behalf of EHI as of today. In this regard, EHI respectfully requests a forty-five (45) day extension of time from today, until January 17, 2025, in which to file its responsive pleading.

Likewise, ELRAC respectfully requests an extension of time until January 17, 2025, to file its responsive pleading. This extension will enable both Defendants to proceed on the same temporal track.

Respectfully submitted,

Rivkin Radler, LLP

Kenneth A. Novikoff

Kenneth A. Novikoff 4872-9448-9592, v. 1

Page 2 of 2

In light of the representation by counsel for Defendants ELRAC, LLC and Enterprise Holdings, Inc., Plaintiff is no longer required to file the letter set forth in the Court's Order at Dkt. No. 10. The Clerk of Court is directed to substitute Defendant "Enterprise Car Rental" on the docket with "ELRAC, LLC."

Additionally, the request for an extension of time to respond is GRANTED; both Defendants must answer or otherwise respond to the Complaint by **January 17**, **2025.** The Clerk of Court is directed to terminate Dkt. No. 13. The Clerk of Court is further directed to mail a copy of this Order to Plaintiff.

SO ORDERED. Date 12/4/2024

HON. MARGAKET M. GARNETT

U.S. DISTRICT JUDGE